

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS

MANDY PALMUCCI,

*Plaintiff,*

vs.

TWITTER, INC., GOOGLE LLC, AND  
FACEBOOK, INC.,

*Defendants.*

Civil Action No. 1:18-cv-01165

Hon. John Z. Lee

**DEFENDANTS' MOTION TO TRANSFER VENUE**

PLEASE TAKE NOTICE that Defendants Twitter, Inc., Google LLC, and Facebook, Inc., by and through their attorneys, hereby move this Court to transfer this action, pursuant to 28 U.S.C. § 1404(a), to the Northern District of California.

As grounds for this motion, Defendants state that a transfer of venue will serve the interest of justice. Two nearly identical actions, as well as a series of substantially similar cases, are currently pending against Defendants in the Northern District of California, so transfer will promote judicial economy by allowing coordination of discovery and other proceedings, avoiding unnecessary expenditure of judicial and party resources, and reducing the likelihood of inconsistent judgments. A transfer of venue will also be more convenient for the parties and witnesses, because the relevant United States-based witnesses, evidence, and operative facts will be found overwhelmingly in the Northern District of California—and not the Northern District of Illinois. Defendants also rely on the accompanying memorandum of law and declarations of Rachel Noble, Sophie Bromberg, Michael Duffey, and Patrick J. Carome.

WHEREFORE, Defendants respectfully request that this Court GRANT this motion and TRANSFER this action to the Northern District of California.

Dated: March 5, 2018

Respectfully submitted,

/s/ Brian M. Willen (w/ consent)

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**CERTIFICATE OF SERVICE**

I hereby certify that on March 5, 2018, I electronically filed the above document with the Clerk of the Court using CM/ECF which will send electronic notification of such filing to all registered counsel.

/s/ Patrick J. Carome  
Patrick J. Carome